# COMMONWEALTH OF MASSACHUSETTS DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Cambridge Electric Sec	tion 34A)	
Tariff Filing	)	DTE 03 - 58
	)	

# CITY OF CAMBRIDGE INFORMATION REQUEST

## City 1-1

We have reviewed the Cost Allocation Study submitted in response to the Department's information request, and marked by the Company as DTE -1-1(d). We draw your attention to the following four numbers in that cost allocation study relating to the cost labeled as "outdoor lighting" maintenance and "outdoor lighting" distribution, and which represent subtotals within the general heading "Transmission Expenses" and "Distribution Expenses" in the column labeled "Outdoor Lighting" in your study:

Total Transmission Expenses	\$22,898	page 16-4 line 22
Total Operation Total Maintenance	\$151,146 \$126,030	page 17-4 line 18 page 18-4 line 13
Total Distribution Expenses	\$277,176	page 18-4 line 17

- a) Do we understand correctly that numbers reproduced above represent the total transmission expenses related to streetlights and total distribution expenses related to streetlights referenced in your Cost Allocation Study?
- b) What portion of the \$22,898 in reported transmission expenses are you attempting to recover in your proposed section 34A transmission tariff?
- c) What additional expenses, above and beyond the \$22,898 in transmission costs reported in your study, are you attempting to recover in your proposed section 34A "transmission" tariff, and can you refer us to the page reference and line reference in your Cost Allocation Study where these additional costs are substantiated?
- d) Do we understand correctly that \$118,166 of the \$126,030 of maintenance costs reported above relates to the maintenance of streetlights? (See entry for streetlight maintenance expenses of \$18,517 (p 17-4 line 22) and 99,649 (p.18-4 line 6).)
- e) By subtracting the \$118,166 of streetlight maintenance expenses that are included in the \$277,176 reported above, we calculate a distribution costs (net of

- streetlight maintenance expenses of) \$159,010 per yr. What portion of the \$159,010 of distribution costs net of streetlight maintenance costs, reported in your study are you attempting to recover in your section 34A "distribution" tariff?
- f) What additional expenses, above and beyond the \$159,010 of distribution costs reported in your study are you attempting to recover in your section 34A "distribution" tariff, and can you refer us to the page reference and line reference in your Cost Allocation Study where these additional costs are substantiated?

## **City 1-2**

The two most common types of municipal streetlights in Cambridge, representing approximately 67% of the total municipal inventory according to company records, are the sodium vapor 9500 lumen and sodium vapor 16,000 lumen streetlight. The Company has requested the following annual "luminaire charges" and "transmission charges" for these two categories of streetlights:

	Luminaire Charge	Transmission Charge
Sodium 9500	33.05	8.96
Sodium 16,000	28.55	13.03

a) If these four requested charges were expressed as a cost per kwh, what would the cost per kwh be for each of the above listed luminaire charges and each of the above listed transmission charges?

# **City 1-3**

On page 38-4, at line 26 of the Cost Allocation Study referenced as DTE 1-1(d) the Company reports that the costs reported, with respect to streetlights, relates to 6,152 streetlights which consume 6,232,495 kwh per year.

- a) Is it correct to say, that the \$22,898 per yr. in streetlight transmission costs referenced in City 1-1 above, from page 16-4 of your study, can be divided by 6,232,495 kwh per yr., to yield a streetlight transmission cost of \$.0036 per kwh?
- b) If the transmission cost per kwh provided in response to City 1-2 above are in excess of \$.0036 per kwh, please explain why?
- c) Is it correct to say that the \$277,176 referenced in City 1-1 above, from p 18-4 of your study, less the streetlight maintenance expenses of \$18,517 (p 17-4 line 22) and 99,649 (p.18-4 line 6) yields a distribution costs less streetlight maintenance costs of \$159,010?

- d) Is correct to say that this \$159,010 per yr. of distribution costs (less streetlight maintenance costs) can be divided by 6,232,495 kwh / yr, to yield a distribution costs (less streetlight maintenance costs) of \$.0255 per kwh?
- e) If the luminaire charges per kwh provided in response to City 1-2 above are in excess of \$.0255 per kwh, please explain why?

## City 1 - 4

- a) Does you proposed S-2 tariff apply to underground served streetlights?
- b) If so, what are the charges that you propose for a 9500 lumen sodium vapor underground served streetlight?

## **City 1-5**

- a) Is there some reason that the Company needs to have different charges for different streetlight types?
- b) Is the Company willing to establish one charge per kwh applicable to all streetlights?

# **City 1-6**

- a) Is the Company aware of the precedent set in DTE 98-69 setting the section 34A distribution tariff at the value supported by the distribution costs reported in the underlying cost of service study?
- b) Please explain the Company's rationale for allowing a section 34A distribution tariff in excess of the distribution costs supported by the cost of service study?

#### **City 1-7**

- a) Is the Company aware of the policy set in DTE 98-108, in which the department scrutinized the section 34A tariff to ensure that it did not include a customer charge for each streetlight?
- b) Please explain the Company's rationale for approving a customer charge per streetlight, when this concept was specifically rejected in DTE 98-108?

Respectfully Submitted By:

John Shortsleeve Attorney for City of Cambridge 978 352 9099